

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
	)	
UNITED STATES	)	
	)	Cr. No. 04-10112-RGS
	)	
v.	)	
	)	
KARL THOMSON	)	
	)	
_____	)	

**MOTION TO CONTINUE TRIAL DATE**  
**(Assented to)**

Now comes the defendant, and moves this Honorable Court to continue the trial date in the above-captioned matter, currently scheduled for January 23, 2006 to March 6, 2006 or a later date convenient to the Court. In support of this Motion, the defendant states that a pre-plea Presentence Report is being prepared, but has not yet been completed or disclosed to the parties. The parties would like to resolve this matter short of trial, if possible, and for that reason sought the preparation of the Presentence Report. Under the circumstances, trial preparation by both sides may be an unnecessary expenditure of resources, and the defense is concerned that if the government is obliged to make final trial preparations in the week to come that the defendant may not be eligible for the full benefit of the acceptance of responsibility adjustment, which is available only upon the government's motion.

Undersigned counsel has conferred with counsel for the prosecution and has been informed that the government assents to the allowance of this Motion.

For the foregoing reasons, the defendant prays the Court allow this Motion.

Respectfully Submitted,  
Karl Thomson  
By his attorney

/s/ Michael C. Andrews  
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